

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re Application of :

EVENSTAR MASTER FUND SPC for and on :
behalf of

EVENSTAR MASTER SUB-FUND I : Civ. Action No. _____
SEGREGATED PORTFOLIO; and
EVENSTAR SPECIAL SITUATIONS :
LIMITED

:
For an Order to Take Discovery Pursuant to 28
U.S.C. § 1782 for Use in a Foreign Proceeding :

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**DECLARATION OF EVA Y. CHAN IN SUPPORT OF PETITION
AND EX PARTE APPLICATION FOR AN ORDER TO TAKE DISCOVERY
FOR USE IN A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

Pursuant to 28 U.S.C. § 1746, I, Eva Y. Chan, declare as follows:

1. I am an associate in the law firm of Skadden, Arps, Slate, Meagher & Flom LLP ("Skadden"), which represents Petitioners Evenstar Master Fund SPC and Evenstar Special Situations (together, "Evenstar") in connection with this Petition to obtain discovery from Ms. Jing Cao, Research Center on Natural Conservation ("RCNC"), New York Military Academy ("NYMA"), Wall Street Global Training Center ("WSGTC"), Best Work Holdings LLC ("Best Work NY") (collectively, the "Proposed Subpoena Recipients") for use in proceedings before the Grand Court of the Cayman Islands.

2. Attached hereto as Exhibit 1 is a true and correct copy of the proposed order authorizing Petitioners to obtain the discovery requested from the Proposed Subpoena Recipients.

3. Attached hereto as Exhibit 2 are the proposed subpoenas *duces tecum* and *ad testificandum* to be issued to RCNC.

4. Attached hereto as Exhibit 3 are the proposed subpoenas *duces tecum* and *ad testificandum* to be issued to NYMA.

5. Attached hereto as Exhibit 4 are the proposed subpoenas *duces tecum* and *ad testificandum* to be issued to WSGTC.

6. Attached hereto as Exhibit 5 are the proposed subpoenas *duces tecum* and *ad testificandum* to be issued to Best Work NY.

7. Attached hereto as Exhibit 6 is the proposed subpoenas *duces tecum* and *ad testificandum* to be issued to Ms. Jing Cao.

8. Attached hereto as Exhibit 7 is a true and correct copy of RCNC's Certificate of Incorporation as publicly filed in the State of New York.

9. Attached hereto as Exhibit 8 is a true and correct copy of NYMA's Charter, obtained from the Board of Regents of the University of the State of New York.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Form 990 filed with the Internal Revenue Service ("IRS") for the year 2017 by NYMA, as obtained from the IRS website.

11. Attached hereto as Exhibit 10 is a true and correct copy of WSGTC's Certificate of Incorporation as publicly filed in the State of New York.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Form 990 filed with the Internal Revenue service for the year 2018 by WSGTC, as obtained from the IRS website.

13. Attached hereto as Exhibit 12 is a true and correct copy of Best Work NY's Articles of Organization as publicly filed in the State of New York.

14. Attached hereto as Exhibit 13 is a extract of a true and correct extracted copy of the Form 20-F filed with the Securities and Exchange Commission for the year 2019 by Fang Holdings, Ltd.

15. Attached hereto as Exhibit 14 is a true and correct copy of a tax lien record for 1 Central Park West Apt 47D, New York, New York 10023, obtained from the New York City Department of Finance Office of the City Register.

16. Attached hereto as Exhibit 15 is a true and correct copy of the deed record for 112 West 56th Street, Apt 21S, New York, New York 10019, obtained from the New York City Department of Finance Office of the City Register.

17. Attached hereto as Exhibit 16 is a true and correct copy of the Form 990 filed with the IRS for the year 2018 by RCNC, as obtained from the IRS website.

18. Attached hereto as Exhibit 17 is a true and correct copy of the Form 13-D filed with the SEC in 2010 by SouFun Holdings, Ltd., as obtained from the SEC website.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 18, 2020
New York, New York

/s/ Eva Y. Chan

Eva Y. Chan